



DEPARTMENT OF HEALTH & HUMAN SERVICES
Health Care Financing Administration

Center for Medicaid and State Operations
Family and Children's Health Program Group
7500 Security Boulevard
Baltimore, MD 21244-1850

Mr. Greg Vadner
Director
State of Missouri
Department of Social Services
Division of Medical Services
P.O. Box 6500
Jefferson City, Missouri 65102

MAR 6 1998

Dear Mr. Vadner:

The Department of Health and Human Services has reviewed your revised proposal, dated February 13, 1998, for a State Children's Health Insurance Program (SCHIP) under Title XXI of the Social Security Act. Under the law, HCFA must either approve, disapprove or request additional information on a proposed Title XXI State Plan within ninety days. The ninety-day review period for Missouri's Title XXI State Plan proposal began on September 29, 1997, when we received the initial version of the plan, the clock was stopped on November 12, 1997 by our letter requesting further information, and was started again on February 17, when we received the revised proposal in our office in Baltimore.

We continue to be concerned that the information included in your revised proposal does not completely answer the questions expressed in our November 12 letter. Therefore, pursuant to Section 2106(c) of the Act, we are writing to request that you provide us with the following additional information in order to ensure we can fully assess your plan. We have the following general concerns:

1. In our November 12 letter, we asked you to provide us with further information regarding your processes to involve the public in the design and implementation of the plan and how you would ensure ongoing public involvement. In the February 13 revised plan, you indicate that you stated during public hearings for the proposed section 1115 waiver amendment that it would be coordinated with the SCHIP plan and that these discussions have continued in the media, the legislature, and in other public settings. Title XXI, section 2107(c) requires that the plan "shall include a description of the process used to involve the public in the design and implementation of the plan and the method for ensuring ongoing public involvement." Please provide a complete description of how you will ensure the public is involved in the future.
2. Also, in the November 12 letter, we asked you to provide us with a detailed budget for the Title XXI program as required in section 2107(d). We are concerned that the budget submitted with the revised plan does not include a detailed description of the planned use

of funds; nor does it include a breakdown of the anticipated administrative costs. Please provide us with a detailed budget for the SCHIP plan.

3. To enable us to complete our review of your plan, we would like additional clarifying information. Specifically, please describe the status of your efforts to seek legislation to bring the current program into compliance with the requirements of Title XXI. When do you believe that enabling legislation will be passed? Please be advised that you will not be able to draw funds from its allotment prior to the effective date of the enabling legislation and actual implementation that is consistent with the requirements of Title XXI. Please specify an anticipated future effective date for implementation at which time your plan will be in compliance with all provisions of Title XXI. If legislation is passed which would change your Title XXI plan as approved, you must submit an amendment request prior to implementing those changes. Additionally, please include a certification that you will not seek to draw down Title XXI funds for periods prior to the time in which the program was in full compliance with the Title XXI requirements.

Processing of your Title XXI State Plan will cease until a substantive response is received. Upon receipt of the additional information, the 90-day review period will resume at the point at which it was stopped by this request. A final decision will be made by day 90 of the review period, unless the information submitted is incomplete and it is again necessary to request additional information. Please send your response, either on disk or electronically, as well as in hard copy to Nancy Goetschius, project officer for Missouri's Title XXI proposal, with a copy to HCFA Region VII. Ms. Goetschius's Internet address is: NGoetschius@HCFA.GOV. Her mailing address is:

Division of Integrated Health Systems
Health Care Financing Administration
Mail Stop C3-18-26
7500 Security Boulevard
Baltimore, Maryland 21244-1850

We appreciate the efforts of your staff and share your goal of providing health care to low income, uninsured children through Title XXI. If you have questions or concerns regarding the matters raised in this letter, your staff may contact either Ms. Goetschius at (410) 786-0707 or Richard Brummel, Associate Regional Administrator for the HCFA

Region VII Division of Medicaid and State Operations, at (816) 426-5925. They will provide or arrange for any technical assistance that you may require in preparing your response. Your cooperation is greatly appreciated.

Sincerely,

Richard Fenton
Deputy Director

cc:
Kansas City RO